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Counsel for Defendant,
TRI MINH DAO

FILE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 13-00580 RMW
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS
)	HEARING; [PROPOSED] ORDER
vs.)	
)	
TRI MINH DAO,)	
)	
Defendant.)	
_____)	

STIPULATION

Defendant Tri Minh Dao, by and through Assistant Federal Public Defender Rita Bosworth, and the United States, by and through Assistant United States Attorney Gary Fry, hereby stipulate that, with the Court's approval, the further status hearing currently set for June 29, 2015, at 9:00 a.m., shall be continued to July 20, 2015, at 9:00 a.m.

The reason for the requested continuance is that defense counsel has just made an appearance in this case and needs time for effective preparation of counsel. In addition, defense counsel has a conflict on June 29, 2015, and is unavailable on that date.

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Stipulation to Continue Hrg.;
~~Proposed~~ Order
No. CR 13-00580-RMW

1 The parties agree that the time between June 29, 2015, and July 20, 2015, is excludable
2 under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for continuity of counsel and
3 effective preparation by defense counsel.

4 IT IS SO STIPULATED.

5 Dated: June 23, 2015

6 s/
7 RITA BOSWORTH
Assistant Federal Public Defender

8 Dated: June 23, 2015

9 s/
10 GARY FRY
Assistant United States Attorney

11 ~~[PROPOSED]~~ **ORDER**

12 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
13 ORDERED that the status hearing shall be continued from June 29, 2015 to July 20, 2015 at 9:00
14 a.m.

15 It is further ordered that the time through and including July 20, 2015, shall be excluded
16 from the computation of time within which trial shall commence under the Speedy Trial Act, as
17 the reasonable time necessary for effective preparation of counsel, pursuant to Title 18, United
18 States Code Section 3161(h)(7)(A) and (h)(7)(B)(iv).

19 IT IS SO ORDERED.

20 Dated: 1st, 2015

21 
22 THE HONORABLE RONALD M. WHYTE
United States District Court Judge